

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT DOUGLAS HARTMAN,

Defendant.

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No.: 4:07CR00405-HEA (DDN)

**DEFENDANT'S UNOPPOSED MOTION FOR ADDITIONAL
TIME AND TO CONTINUE EVIDENTIARY HEARING**

COMES NOW Defendant, Robert Douglas Hartman, by and through counsel, and for his Unopposed Motion for Additional Time and to Continue Evidentiary Hearing states as follows:

1. Discovery in this matter includes approximately more than 200,000 pages which are stored in a room in the courthouse and is a part of the total discovery. Defendant's counsel has been advised that there are approximately 15 to 20 additional boxes of documents stored off the courthouse premises. Counsel for Defendant and others for Defendant have been making an attempt to review the discovery as best as it can be reviewed under the circumstances. The necessary review of the discovery will require a substantial amount of time.

2. While Defendant has filed some pre-trial motions, it is anticipated that after a complete review of the discovery materials, additional motions may need to be filed.

3. Presently, motions to be filed by this defendant are due to be filed on October 5, 2007 and a pre-trial evidentiary hearing is set for October 16, 2007 at 9:00 a.m.

4. In view of the fact that the discovery is even far more voluminous than anticipated, Defendant request that he be granted an additional sixty (60) days or until December

5, 2007 to file pre-trial motions, and that this matter be rescheduled for a Status Conference after the pre-trial motions have been filed.

5. Counsel for Plaintiff and Defendant have spoken regarding this matter, and counsel for Plaintiff does not oppose the granting of this Motion.

WHEREFORE, Defendant prays this Court grant his Unopposed Motion for Additional Time and to Continue Evidentiary Hearing.

Respectfully submitted,

/s/Burton H. Shostak
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of October, 2007, a true and correct copy of the foregoing was electronically filed with Clerk of the Court to be served by operation of the Court's CM/ECF electronic filing system upon the following:

Howard J. Marcus

howard.marcus@usdoj.gov julie.hurst@usdoj.gov; gretchen.hemm@usdoj.gov; and
usamoe.crimdock@usdoj.gov

/s/Burton H. Shostak